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*Counsel for the Official Committee
of Unsecured Creditors for Electrotek Corporation*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:)	
)	Chapter 11
Electrotek Corporation,)	Case No. 21-30409-mvl-11
)	
Debtor.)	

**MOTION FOR SETTING AND
REQUEST FOR EXPEDITED HEARING**

The Official Committee of Unsecured Creditors hereby request that a hearing be set on November 15, 2021 at 9:30 a.m. regarding *Objection of The Official Committee of Unsecured Creditors of Electrotek Corporation to the Allowance of the Scheduled Claim of Insider Dhirajal Babaria* (Dkt. 140) (the “Claim Objection”). Hearing by such date is necessary because the underlying legal and factual issues are intertwined with Debtor’s attempt to confirm its *Chapter 11 Plan* [Dkt. No. 27] (the “Plan”), as revised, and the Committee’s *Motion to Appoint Chapter 11 Trustee* [Dkt. No. 118] (the “Motion to Appoint”), at the current hearing scheduled on November 15, 2021.

Notice of proposed expedited hearing will be provided to the U.S. Trustee, Debtor, Debtor's Counsel, as well as parties receiving electronic notice in this case via the Court's ECF system in advance of the hearing.

A hearing was not requested earlier because the facts involving the Claim Objection were intended to be heard in conjunction with the Plan and the Motion to Appoint. However, given the comments of the Court and parties at the October 20, 2021, Confirmation Hearing, the Committee believes that hearing the Claim Objection in conjunction with the Plan and the Motion to Appoint is the most expeditious use of the Court and the estate's resources.

Dated: October 27, 2021.

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Caleb T. Holzaepfel

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ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS

CERTIFICATE OF CONFERENCE

I certify that I conferred with the U.S. Trustee, counsel for Debtor and counsel to Dhirajal Babaria regarding the relief requested in this Objection by email on October 25, 2021, and October 26, 2021. Debtor did not take a position. The U.S. Trustee did not respond. Dhirajal Babaria is opposed to the relief requested in this Objection.

/s/ Caleb T. Holzaepfel

Caleb Holzaepfel

CERTIFICATE OF SERVICE

I certify that on October 27, 2021, a copy of this document was served by electronic service on parties registered to receive notice via the Court's CM/ECF system or via United States first-class mail as listed below.

/s/ Caleb T. Holzaepfel

Caleb T. Holzaepfel

Notice will be mailed via United States first-class mail to:

Dhirajal Babaria
435 Shady Lane
Southlake, Texas 76092